

BEFORE THE

ORIGINAL

Federal Communications Commission

WASHINGTON, D.C. 20554

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APR 24 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Petition of MCI Telecommunications)

Corporation for Declaratory Ruling That)

Carriers May Assess Interstate Customers an)

Interstate Universal Service Charge Which is)

Based on Total Revenues)

CC Docket No. 96-45

To: The Commission

**COMMENTS OF ADVANCED
COMMUNICATIONS GROUP, INC.**

Norman P. Leventhal
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April 24, 1998

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To: The Commission

COMMENTS OF ADVANCED COMMUNICATIONS GROUP, INC.

Advanced Communications Group, Inc. ("ACG"),¹ by its attorneys and pursuant to the Public Notice released by the Commission on April 10, 1998 (DA 98-682), hereby comments on the Petition for Declaratory Ruling filed by MCI Telecommunications Corporation ("MCI") in the above-captioned proceeding.²

ACG comments at this time for the limited purpose of urging, as MCI has done, that the Commission issue a declaratory ruling pursuant to Section 1.2 of its rules in order to remove uncertainty as to how carriers may recover the cost of federal universal service. More specifically, ACG requests that the Commission clarify whether or not carriers may impose a charge on interstate customers that is based on the customers' total billed revenues, including

¹ ACG is a Delaware corporation that offers duly authorized inter- and intra-state telecommunications services in several U.S. states. ACG also holds a global authorization pursuant to Section 214 of the Communications Act of 1934, as amended, to provide international resale services. See FCC File No. ITC-97-626.

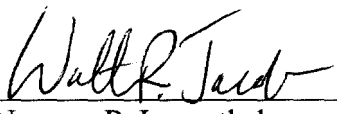
² ACG is not filing an electronic copy of the instant Comments via the Internet or via diskette.

intrastate revenues, to recover federal universal service costs.

ACG hereby reserves the right to file reply comments in the above-captioned proceeding, should it find the need to do so.

Respectfully submitted,

ADVANCED COMMUNICATIONS
GROUP, INC.

By: 
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April 24, 1998

Its Attorneys

CERTIFICATE OF SERVICE

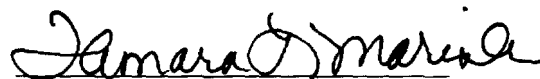
I hereby certify that I have this 24th day of April, 1998 caused true and correct copies of the foregoing "Comments of Advanced Communications Group, Inc." to be served by first class mail, postage prepaid, on the following:

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